

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.. THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated:

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

Civil Action No: 07 Civ. 9790 (SHS)

MOTION FOR ADMISSION OF ROBERT IZARD PRO HAC VICE

Civil Action No: 07 Civ. 10294 (DC)

Civil Action No: 07 Civ. 10341 (UA)

ANTON RAPPOLD, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 10396 (UA)

v.

CITIGROUP INC., CITIBANK, N.A.,
CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF
CITIGROUP INC., THE 401(k)
INVESTMENT COMMITTEE, and JOHN
and JANE DOES 1 - 10,

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID. KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS. ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

STEPHAN FIORINO, individually and on behalf of all others similarly situated,

Plaintiff, : Civil Action No: 07 Civ. 10458 (UA)

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, :

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

Plaintiff, : Civil Action No: 07 Civ. 10461 (UA)

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

____X

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR: PUERTO RICO, and all others similarly,

Plaintiff, : Civil Action No: 07 Civ. 10472 (UA)

v.

CITIGROUP, INC., CITIBANK, N.A.,
THE PLAN ADMINISTRATIVE
COMMITTEE OF CITIGROUP, INC.,
MICHAEL E. SCHLEIN, JOHN DOES
1-10, THE CITIGROUP 401(k) PLAN
INVESTMENT COMMITTEE and JOHN
:

DOES 10-20, C. MICHAEL

ARMSTRONG, ALAN J.P. BELDA,
GEORGE DAVID, KENNETH T. DERR,
JOHN M. DEUTCH, ROBERTO
HERNANDEZ, ANN DIBBLE JORDAN,
ANDREW N. LIVERIS, DUDLEY C.
MECUM, ANNE M. MULCAHY,
RICHARD D. PARSONS, ANDRALL E.
PEARSON, CHARLES PRINCE, JUDITH
RODIN, ROBERT E. RUBIN, FRANKLIN
A. THOMAS, SANFORD I. WEILL,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, William Bernarduci, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Robert Izard. Mr. Izard's address is:

Schatz Nobel, Izard, P.C. 20 Church Street, Suite 1700 Hartford, Connecticut 06103 Phone Number: (860) 493 6292 Fax Number: (860) 493 6292

 $\underline{rizard@snilaw.com}$

Robert Izard is a member in good standing of the Bar of the State of Connecticut. He was admitted to the Connecticut bar on May 28, 1987. Attached hereto as Exhibit A is a Certificate of Good Standing. Mr. Izard has subsequently been admitted to practice in the following courts:

- a. United States District Court for the District of Connecticut (1987);
- b. All Courts of the State of North Carolina (1983);
- c. United States District Court for the Middle District of North Carolina (1985);
- d. United States District Court for the Western District of North Carolina (1983);
- e. United States Court of Appeals for the Fourth Circuit (1986);

- f. United States Court of Appeals for the Second Circuit (1990);
- g. United States Supreme Court (1991);
- h. United States District Court for the District of Colorado (2001);
- i. United States Court of Appeals for the First Circuit (2006); and
- j. United States Court of Appeals for the Fifth Circuit (2006)

Dated: January 16, 2008

Respectfully submitted,

SCHATZ NOBEL IZARD, P.C.

William Bernarduci (WB 5785) 20 Church Street, Suite 1700 Hartford, Connecticut 06103

Phone Number: (860) 493 6292 Fax Number: (860) 493 6292



State of Connecticut

Supreme Court

I, Michéle T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

Do hereby certify that, in the Superior Court at Hartford

on the

twenty-eighth

, day of

May

1987

Robert A. Izard, Jr.

of

West Hartford, Connecticut

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, and that said attorney is a member in good standing of the Bar of this State pursuant to Practice Book §2-65.

In Testimony Whereof, I have hereunto set my hand and affix the Seal of the Supreme Court of the State of Connecticut, at

Hartford, this

sixteenth

day of

January

. 20 **08**

Michele Illing.
Michele T. Angers

Chief Clerk



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.

Nancy A. Kulesa

Nancy G. Kullerer

CITIGROUP ERISA LITIGATION SERVICE LIST

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 9790 (SHS)

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated:

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

DECLARATION OF WILLIAM BERNARDUCI IN SUPPORT OF MOTION FOR ADMISSION OF ROBERT IZARD PRO HAC VICE

Civil Action No: 07 Civ. 10294 (DC)

Civil Action No: 07 Civ. 10341 (UA)

ANTON RAPPOLD, individually and on

behalf of all others similarly situated,

Plaintiff, : Civil Action No: 07 Civ. 10396 (UA)

v.

CITIGROUP INC., CITIBANK, N.A.,
CHARLES PRINCE, THE PLANS
ADMINISTRATIVE COMMITTEE OF
CITIGROUP INC., THE 401(k)
INVESTMENT COMMITTEE, and JOHN
and JANE DOES 1 - 10,

Defendants.

SAMIER TADROS, on Behalf of All

Others Similarly Situated,

Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants.

STEPHAN FIORINO, individually and on

behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 10458 (UA)

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, :

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

Plaintiff, : Civil Action No: 07 Civ. 10461 (UA)

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the : CITIBUILDER 401 (K) PLAN FOR : PUERTO RICO, and all others similarly, :

-----X

Plaintiff, : Civil Action No: 07 Civ. 10472 (UA)

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAN J.P. BELDA. GEORGE DAVID, KENNETH T. DERR. JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN. ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY. RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH: RODIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, SANFORD I. WEILL,

Defendants.

- I, William Bernarduci, hereby declare as follows:
- 1. I am an attorney at Schatz Nobel Izard, P.C., counsel for Plaintiff, Shaun Rose, in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Robert Izard as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York on November 24, 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
 - 3. I have known Robert Izard since 2004.
 - 4. Mr. Izard is a partner at Schatz Nobel Izard, P.C., in Hartford, Connecticut.
- 5. I have found Mr. Izard to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
 - 6. Accordingly, I am pleased to move the admission of Robert Izard pro hac vice.
 - 7. I respectfully submit a proposed order granting the admission of Robert Izard, pro

hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert Izard pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: January 16, 2008

William Bernarduci (WB 5785) 20 Church Street, Suite 1700

Hartford, Connecticut 06103 Phone Number: (860) 493 6292

Fax Number: (860) 493 6292

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 9790 (SHS)

[PROPOSED] ORDER ADMITTING

ROBERT IZARD PRO HAC VICE

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 10294 (DC)

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.. THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated:

Plaintiff,

Civil Action No: 07 Civ. 10341 (UA)

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

ANTON RAPPOLD, individually and on

behalf of all others similarly situated,

Civil Action No: 07 Civ. 10396 (UA)

v.

CITIGROUP INC., CITIBANK, N.A., : CHARLES PRINCE, THE PLANS : ADMINISTRATIVE COMMITTEE OF : CITIGROUP INC., THE 401(k) : INVESTMENT COMMITTEE, and JOHN : and JANE DOES 1 - 10, :

Defendants.

Plaintiff,

SAMIER TADROS, on Behalf of All

Others Similarly Situated,

Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants.

STEPHAN FIORINO, individually and on

behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 10458 (UA)

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, :

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

Plaintiff, :

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the : CITIBUILDER 401 (K) PLAN FOR : PUERTO RICO, and all others similarly, :

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN Civil Action No: 07 Civ. 10461 (UA)

Civil Action No: 07 Civ. 10472 (UA)

DOES 10-20, C. MICHAEL	:
ARMSTRONG, ALAN J.P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ, ANN DIBBLE JORDAN,	:
ANDREW N. LIVERIS, DUDLEY C.	:
MECUM, ANNE M. MULCAHY,	:
RICHARD D. PARSONS, ANDRALL E.	:
PEARSON, CHARLES PRINCE, JUDITH	:
RODIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, SANFORD I. WEILL,	:
	:
Defendants.	:
	X

Upon the motion of attorney William Bernarduci for admission of Robert Izard pro hac vice, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Robert Izard 20 Church Street, Suite 1700 Hartford, Connecticut 06103 Phone Number: (860) 493 6292 Fax Number: (860) 493 6292

admitted to practice pro hac vice as counsel for in the above captioned case in the United States
vistrict Court for the Southern District of New York.
Pated:
Sidney Stein United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 16th day of January 2007, a copy of the foregoing was served by U.S. Mail, postage pre-paid, to the counsel of record on the attached service list. Parties may also access this filing through the Court's system.

Mancy A. Kulesa

CITIGROUP ERISA LITIGATION SERVICE LIST

Counsel For Defendants:

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Attorneys for Defendants Citigroup, Inc., et al.

Counsel for Plaintiffs:

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Attorneys for Plaintiff Samier Tadros (07cv10442-SHS)

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Attorneys for Plaintiff James Bolla (07cv10461-UA)

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Attorneys for Plaintiff Anton Rappold (07cv10396-UA)

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Attorneys for Plaintiff Mark Geroulo (07cv10472-UA)

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